

Clarke County Board of Supervisors



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November 16, 2010

Anita Riggleman
Valley Regional Office
P.O. Box 3000
4411 Early Road
Harrisonburg, VA 22801

Dear Ms. Riggleman,

Thank you for the opportunity to comment on the draft permit from the Department of Environmental Quality to limit air pollution from a facility in Warren County, Virginia. It is our understanding that Dominion Power has applied for a permit to construct the Warren County Power Station, a natural gas-fired combined-cycle combustion turbine electric power generating facility having an electric output capacity of approximately 1,280 megawatts.

The Clarke County Board of Supervisors has several concerns regarding this application. Of primary concern is the addition of a major air polluter in our region that will reduce our visibility and increase acidity in our waterways. Another important concern is the impact of the plant emissions on Shenandoah National Park. As you know, the Clean Air Act administered by the Environmental Protection Agency sets the air quality standards for the nation. Restrictions on emissions are strictest in Class I areas. Shenandoah National Park is a designated Class I area. The Park and Skyline Drive represent a significant tourist attraction for our area bringing tens of thousands of visitors each year. These tourists spend money in the surrounding counties including Clarke.

If approved this will be one of the largest electric power production plant permitted in Virginia. Based on testimony at the Public Hearing (11/9/10) the National Park Service is opposed to the project unless certain reductions in emissions are made to the proposed facility. Clarke County is not opposed to the concept of new power generators and recognizes the need for such in order to provide power to an ever-increasing human population, however the design as submitted seems too large considering the proximity to the Park. If the plant was reduced in size and therefore emissions could be reduced that maybe seen as an improvement.

Based on the current draft permit we would respectfully request at a minimum:

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- 1) That DEQ staff request a public hearing and review by the State Air Pollution Control Board due to the potential significant negative impact to air quality in the northern Shenandoah Valley and the National Park;
- 2) If the plant is to be located at the proposed site, that the standards regarding emissions and emission controls be the Lowest Achievable Emissions Rate (LAER) given the plant's proximity to the Park, DEQ and the Air Board should require a LAER-type analysis for all pollutants;
- 3) Clarify how particulate matter is addressed in the draft permit. It appears as though PM-2.5 is being included in the emissions for PM-10 (211.5 tons per year) however in information obtained directly from DEQ the PM levels were split out (PM-10 – 216.1 tpy, PM-2.5 – 215.6 tpy). Since the Clean Air Act requires that each be treated independently in the permit it appears as though the draft permit should be amended to show the accurate numbers; and,
- 4) With regards to the offsets for emissions of nitrogen oxides, the ratios should be strengthened from 1.15 to 1 to 2 to 1 for sources close to the Park; and if Dominion is not able to get sufficient offsets close to the park, they should be required to find offsets at a 3 to 1 ratio if the facilities are farther away. This should not be considered unreasonable given the significant risk the Plant poses to the National Park and the tourism and natural environment of Clarke County.

The Clarke County Board of Supervisors appreciates your consideration with regards to these requests.

Sincerely,



J. Michael Hobert
Chair, Clarke Board of Supervisors

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